

**INDIANA DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT
OFFICE OF AIR QUALITY**

and

**INDIANAPOLIS OFFICE OF ENVIRONMENTAL
SERVICES**

MINOR SOURCE OPERATING PERMIT

**The Jackson Group
5804 Churchman By-Pass
Indianapolis, Indiana 46203**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 097-17631-00329	
Issued by: Originally signed by John B. Chavez John B. Chavez Administrator	Issuance Date: August 18, 2003 Expiration Date: August 18, 2008

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and City of Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates stationary printing plant.

Authorized Individual: Director of Operations
Source Address: 5804 Churchman By-Pass, Indianapolis, Indiana 46203.
Mailing Address: 5804 Churchman By-Pass, Indianapolis, Indiana 46203.
General Source Phone: (317) 791-1414
SIC Code: 2752
County Location: Marion
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source under PSD Rules
Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

(a) Jackson Press, Inc., Large Press Department:

- (1) One (1) 706 Roland Non-Heat Set Sheetfed Lithographic Printing Press identified as EU1 with a maximum line speed of 586 feet per minute and a maximum printing width 28.15 inches and a maximum operating capacity of 15000 IPH (Images per Hour).
- (2) One (1) 440 Roland Rekord Non-Heat Set Sheetfed Lithographic Printing Press identified as EU2 with a maximum line speed of 349 feet per minute and a maximum printing width 30.19 inches and a maximum operating capacity of 9000 IPH (Images per Hour).
- (3) One (1) 26 Komori Non-Heat Set Sheetfed Lithographic Printing Press identified as EU3 with a maximum line speed of 174 feet per minute and a maximum printing width 24.88 inches and a maximum operating capacity of 7000 IPH (Images per Hour).

(b) Jackson Press, Inc., Small Press Department:

- (1) One (1) E47 HAMADA Non-Heat Set Sheetfed Lithographic Printing Press identified as EU4 with a maximum line speed of 124.5 feet per minute and a maximum printing width 13.56 inches and a maximum operating capacity of 5000 IPH (Images per Hour).
- (2) One (1) 665 HAMADA Non-Heat Set Sheetfed Lithographic Printing Press identified as EU5 with a maximum line speed of 68.7 feet per minute and a maximum printing width 11.5 inches and a maximum operating capacity of 3000 IPH (Images per Hour).

- (3) One (1) 655 Hamada Non-Heat Set Sheetfed Lithographic Printing Press identified as EU6 with a maximum line speed of 114.6 feet per minute and a maximum printing width 11.5 inches and a maximum operating capacity of 5000 IPH (Images per Hour).
- (c) Total Response, Inc., Mailing Department:
 - (1) Two (2) 270G Videojet Systems for address labelling identified as EU8 and EU9 with a maximum operating capacity of 30 lines/minute.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

Office of Environmental Services
Air Quality Management Section
Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and OES on or before the date it is due.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section
Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAQ and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ AND OES. IDEM, OAQ AND OES may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section
Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

Any such application shall be certified by an “authorized individual” as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No Permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

**B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2]
[IC 13-30-3-1]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ and OES, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch and OES, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ and OES shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ and OES within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

- C.1 **Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]**
Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.
- C.2 **Permit Revocation [326 IAC 2-1.1-9]**
Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit operate may be revoked for any of the following causes:
- (a) Violation of any conditions of this permit.
 - (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
 - (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
 - (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
 - (e) For any cause which establishes in the judgment of IDEM, OAQ and OES, the fact that continuance of this permit is not consistent with purposes of this article.
- C.3 **Opacity [326 IAC 5-1]**
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.4 **Fugitive Dust Emissions [326 IAC 6-4]**
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).
- C.5 **Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**
(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section
Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements

C.6 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ and OES.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section
Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ and OES of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ and OES if the source submits to IDEM, OAQ and OES a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

The Administrator may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements

C.8 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.9 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Record Keeping and Reporting Requirements

C.10 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ and OES using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.11 Emission Statement [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of regulated pollutants (as defined by 326 IAC 2-7-1(32) "Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section
Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and OES on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.12 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the Administrator within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.13 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section
Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and OES on or before the date it is due.

- (c) Unless otherwise specified in this permit, any annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report do not require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) Jackson Press, Inc., Large Press Department:

- (1) One (1) 706 Roland Non-Heat Set Sheetfed Lithographic Printing Press identified as EU1 with a maximum line speed of 586 feet per minute and a maximum printing width 28.15 inches and a maximum operating capacity of 15000 IPH (Images per hour).
- (2) One (1) 440 Roland Rekord Non-Heat Set Sheetfed Lithographic Printing Press identified as EU2 with a maximum line speed of 349 feet per minute and a maximum printing width 30.19 inches and a maximum operating capacity of 9000 IPH (Images per hour).
- (3) One (1) 26 Komori Non-Heat Set Sheetfed Lithographic Printing Press identified as EU3 with a maximum line speed of 174 feet per minute and a maximum printing width 24.88 inches and a maximum operating capacity of 7000 IPH (Images per hour).

(b) Jackson Press, Inc., Small Press Department:

- (1) One (1) E47 HAMADA Non-Heat Set Sheetfed Lithographic Printing Press identified as EU4 with a maximum line speed of 124.5 feet per minute and a maximum printing width 13.56 inches and a maximum operating capacity of 5000 IPH (Images per hour).
- (2) One (1) 665 HAMADA Non-Heat Set Sheetfed Lithographic Printing Press identified as EU5 with a maximum line speed of 68.7 feet per minute and a maximum printing width 11.5 inches and a maximum operating capacity of 3000 IPH (Images per hour).
- (3) One (1) 655 Hamada Non-Heat Set Sheetfed Lithographic Printing Press identified as EU6 with a maximum line speed of 114.6 feet per minute and a maximum printing width 11.5 inches and a maximum operating capacity of 5000 IPH (Images per hour).

(c) Total Response, Inc., Mailing Department:

- (1) Two (2) 270G Videojet Systems for address labelling identified as EU8 and EU9 with a maximum operating capacity of 30 lines/minute.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Large Press Department shall not exceed 1.32 pounds per hour when operating with a corn starch process weight rate of 369 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour;
and

P = process weight rate in tons per hour

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

D.1.3 Volatile Organic Compounds and Major Sources of Hazardous Air Pollutants [326 IAC 8-1-6 and 2-4.1]

- (a) Any change or modification which will increase the potential to emit from the presses of Volatile Organic Compounds (VOCs) to twenty-five (25) tons per year or more shall obtain prior approval from IDEM, OAQ and OES, and shall be subject to 326 IAC 8-1-6.
- (b) Any change or modification which will increase the potential to emit from the presses of a single Hazardous Air Pollutant (HAP) to ten (10) tons per year or a combination of Hazardous Air Pollutants (HAPs) to twenty-five (25) tons per year or more shall obtain prior approval from IDEM, OAQ and OES, and shall be subject to 326 IAC 2-4.1.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.4 Record Keeping Requirements

To document compliance with Condition D.1.3, the Permittee shall maintain records of the VOC content and the quantity of each coating material and solvent used and the HAP content and the quantity of each coating material and solvent used.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
AND
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	The Jackson Group
Address:	5804 Churchman By-Pass
City:	Indianapolis
Phone #:	(317) 791-1414
MSOP #:	097-17631-00329

I hereby certify that The Jackson Group is ☐ still in operation.
 ☐ no longer in operation.

I hereby certify that The Jackson Group is
 ☐ in compliance with the requirements of MSOP 097-17631- 00329.
 ☐ not in compliance with the requirements of MSOP 097-17631- 00329.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
FAX NUMBER - 317 327-2274

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ? _____, 25 TONS/YEAR SULFUR DIOXIDE ? _____, 25 TONS/YEAR NITROGEN OXIDES ? _____, 25 TONS/YEAR VOC ? _____, 25 TONS/YEAR HYDROGEN SULFIDE ? _____, 25 TONS/YEAR TOTAL REDUCED SULFUR ? _____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ? _____, 25 TONS/YEAR FLUORIDES ? _____, 100 TONS/YEAR CARBON MONOXIDE ? _____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ? _____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ? _____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ? _____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ? _____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: The Jackson Group

PHONE NO. (317)791-1414

LOCATION: INDIANAPOLIS, MARION COUNTY

PERMIT NO. 097-17631

AFS PLANT ID: 00329

AFS POINT ID: _____ INSP: _____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND
REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis Office of Environmental Services**

**Addendum to the
Technical Support Document for Minor Source State Operating Permit (MSOP)**

Source Background and Description

Source Name:	The Jackson Group
Source Location:	5804 Churchman By-Pass, Indianapolis, IN 46203
County:	Marion
SIC Code:	2759
Operation Permit No.:	097-17631-00329
Permit Reviewer:	Keshav Reddy

On July 12, 2003, the Office of Environmental Services (OES) had a notice published in the Indianapolis Star Newspaper, Indianapolis, Indiana, stating that The Jackson Group had applied for a Minor Source State Operating Permit (MSOP) to operate printing presses. The notice also stated that OES and Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The following changes, to the draft MSOP Permit, will be made. The TSD will remain as it originally appeared when published. These changes have no effect on the potential to emit (PTE) for this source. OES and OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the permit has been published are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Upon further review, the OES has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. The emissions unit listed in Section A.2(a)(1) as "One 770 Roland non-heat set..." should actually be "One 706 Roland non-heat set..."
2. The emissions unit listed in Section A.2(b)(3) as "One 26 Komori non-heat set..." should actually be "One 665 Hamada non-heat set..."

The conditions have been updated, in condition A.2 and respective D Sections of the permit, to include the correction as follows:

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

(a) Jackson Press, Inc., Large Press Department:

- (1) One (1) ~~770~~ **706** Roland Non-Heat Set Sheetfed Lithographic Printing Press identified as EU1 with a maximum line speed of 586 feet per minute and a maximum printing width 28.15 inches and a maximum operating capacity of 15000 IPH (Images per Hour).
- (2) One (1) 440 Roland Rekord Non-Heat Set Sheetfed Lithographic Printing Press identified as EU2 with a maximum line speed of 349 feet per minute and a maximum printing width 30.19 inches and a maximum operating capacity of 9000 IPH (Images per Hour).
- (3) One (1) 26 Komori Non-Heat Set Sheetfed Lithographic Printing Press identified as EU3 with a maximum line speed of 174 feet per minute and a maximum printing width 24.88 inches and a maximum operating capacity of 7000 IPH (Images per Hour).

(b) Jackson Press, Inc., Small Press Department:

- (1) One (1) E47 HAMADA Non-Heat Set Sheetfed Lithographic Printing Press identified as EU4 with a maximum line speed of 124.5 feet per minute and a maximum printing width 13.56 inches and a maximum operating capacity of 5000 IPH (Images per Hour).
- (2) One (1) 665 HAMADA Non-Heat Set Sheetfed Lithographic Printing Press identified as EU5 with a maximum line speed of 68.7 feet per minute and a maximum printing width 11.5 inches and a maximum operating capacity of 3000 IPH (Images per Hour).
- (3) One (1) ~~26 Komori~~ **655 Hamada** Non-Heat Set Sheetfed Lithographic Printing Press identified as EU6 with a maximum line speed of 114.6 feet per minute and a maximum printing width 11.5 inches and a maximum operating capacity of 5000 IPH (Images per Hour).

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis Office of Environmental Services**

**Technical Support Document (TSD) for a Minor Source Operating Permit
(MSOP)**

Source Background and Description

Source Name: The Jackson Group
Source Location: 5804 Churchman By-Pass, Indianapolis, IN 46203
County: Marion
SIC Code: 2759
Operation Permit No.: 097-17631-00329
Permit Reviewer: Keshav Reddy

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and City of Indianapolis Office of Environmental Services (OES) have reviewed MSOP application from The Jackson Group (comprised of three separate companies under common ownership: Jackson Press, Inc., Total Response, Inc., and Jackson Studios Inc.) relating to the operation of printing presses. The Jackson Group was issued CP 0980329-01 on July 16, 1998.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Jackson Press, Inc., Large Press Department:
- (1) One (1) 770 Roland Non-Heat Set Sheetfed Lithographic Printing Press identified as EU1 with a maximum line speed of 586 feet per minute and a maximum printing width 28.15 inches and a maximum operating capacity of 15000 IPH (Images per Hour).
 - (2) One (1) 440 Roland Rekord Non-Heat Set Sheetfed Lithographic Printing Press identified as EU2 with a maximum line speed of 349 feet per minute and a maximum printing width 30.19 inches and a maximum operating capacity of 9000 IPH (Images per Hour). Particulate emissions are controlled by dry particulate filters with a control efficiency of 98%.
 - (3) One (1) 26 Komori Non-Heat Set Sheetfed Lithographic Printing Press identified as EU3 with a maximum line speed of 174 feet per minute and a maximum printing width 24.88 inches and a maximum operating capacity of 7000 IPH (Images per Hour).
- (b) Jackson Press, Inc., Small Press Department:
- (1) One (1) E47 HAMADA Non-Heat Set Sheetfed Lithographic Printing Press

identified as EU4 with a maximum line speed of 124.5 feet per minute and a maximum printing width 13.56 inches and a maximum operating capacity of 5000 IPH (Images per Hour).

- (2) One (1) 665 HAMADA Non-Heat Set Sheetfed Lithographic Printing Press identified as EU5 with a maximum line speed of 68.7 feet per minute and a maximum printing width 11.5 inches and a maximum operating capacity of 3000 IPH (Images per Hour).
- (3) One (1) 26 Komori Non-Heat Set Sheetfed Lithographic Printing Press identified as EU6 with a maximum line speed of 114.6 feet per minute and a maximum printing width 11.5 inches and a maximum operating capacity of 5000 IPH (Images per Hour).

(c) Total Response, Inc., Mailing Department:

- (1) Two (2) 270G Videojet Systems for address labeling identified as EU8 and EU9, each with a maximum operating capacity of 30 lines/minute.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Emission Units and Pollution Control Equipment Removed From Service

(a) Jackson Press, Inc., Small Press Department:

- (1) One (1) 217 ATF Non-Heat Set Sheetfed Lithographic Printing Press identified as EU7 with a maximum line speed of 69 feet per minute and a maximum printing width 10.5 inches and a maximum operating capacity of 3000 IPH (Images per Hour).

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP 0980329-01, issued on July 16, 1998.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
00B	Large Presses EU1,EU2,EU3	25	ND	ND	Ambient
00B	Small Presses EU4, EU5, EU6	25	ND	ND	Ambient
00B	Videojet Systems EU8, EU9	25	ND	ND	Ambient
001	Press EU1	30	1.0	ND	Ambient
002	Press EU2	30	1.0	ND	Ambient

Recommendation

The staff recommends to the Administrator that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on April 17, 2003.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (4 Pages).

Potential To Emit of Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	6.10
PM-10	6.10
SO ₂	0.00
VOC	54.35
CO	0.00
NO _x	0.00

HAP's	Potential To Emit (tons/year)
Toluene	6.91
Ethylene Glycol	2.01
Glycol Ethers	7.24
Methanol	2.95
Hexane	0.38
TOTAL	19.49

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	Unclassifiable
SO ₂	maintenance attainment
NO ₂	attainment
Ozone	maintenance attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Marion County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2002 OES emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not Reported
PM-10	Not Reported
SO ₂	Not Reported
VOC	5.87
CO	Not Reported
NO _x	Not Reported
HAPs	Not Reported

Source Status

Existing Source PSD, Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	6.10
PM10	6.10
SO ₂	0.00
VOC	54.35
CO	0.00
NO _x	0.00

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

- a) New Source Performance Standards (326 IAC 12) and 40 CFR Part 63:

40 CFR, § 60.430, Subpart QQ - Standards of Performance for the Graphic Arts Industry : Publication Rotogravure Printing : This standard applies to each publication rotogravure printing press, that commences construction, modification or reconstruction after October 28, 1980.

The six (6) Non-Heat Set Sheetfed lithographic printing presses are not subject to the NSPS, because they are not rotogravure printing presses.

- (b) National Emission Standards for Hazardous Air Pollutants (NESHAPs)

40 CFR, § 63.820, Subpart KK - National Emission Standard for the Printing and Publishing Industry: This standard applies to major source of hazardous air pollutants (HAPs), at which publication rotogravure, product and packaging rotogravure or wideweb flexographic printing presses are operated.

The six (6) Non-Heat Set Sheetfed lithographic printing presses are not subject to the NESHAP, because they are not publication, product and packaging rotogravure printing presses, nor they are wide-web flexographic printing presses, and they are not major for single HAP and combined HAPs.

- (c) National Emission Standards for Hazardous Air Pollutants (NESHAPs)

40 CFR, § 63.3290, Subpart JJJJ - National Emission Standards for Paper and other Web Coating Industry: This standard applies to major source of hazardous air pollutants (HAPs), at which coating of folding paper board boxes, packing paper, label, medical tape, foil, commercial printing, etc. takes place.

The six (6) sheet-fed non-heatset lithographic presses, located at the source are not subject to this NESHAP, because the source is not major for single HAP and combined HAPs and web coating in lithography is specifically exempted by § 63.3300(c).

State Rule Applicability - Entire Source

326 IAC 2-5.1-3 (Permits) and 326 IAC 2-6.1 (Minor Source Operating Permit)

This source is subject to the requirements to obtain a minor source operating permit under 326 IAC 2-6.1 because it is an existing source with a potential to emit of Volatile Organic Compounds (VOC) greater than 25 tons per year.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source

must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-1 (Non-Attainment Area Limitations)

This source is not subject to the limits of 326 IAC 6-1(Non-Attainment Area Limitations) for Particulate Matter since the PTE of particulate matter is less than 100 tons per year and actual emissions of particulate matter is less than 10 tons per year.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust may not be visibly crossing the property lines of the source, except as provided in 326 IAC 6-4-6.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Manufacturing Processes)

Pursuant to 6-3-2(e), the particulate emissions from the Large Press Department (consisting of emission units EU1, EU2 and EU3) with a maximum corn starch handling (to keep substrate dry and non-sticky) rate of 369 lbs/hr, shall be limited to 1.32 pounds per hour. This emission rate can be calculated by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

326 IAC 6-3-2 (Manufacturing Processes)

Pursuant to 6-3-2(e), the particulate emissions from the Small Press Department (consisting of emission units EU4, EU5 and EU6) with a maximum corn starch handling (to keep substrate dry and non-sticky) rate of 41 lbs/hr, shall be limited to 0.551 lbs/hr.

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to new facilities as of January 1, 1980, that have potential VOC emissions of 25 tons per year or greater if no other specific rule in article 8 is applicable. None of the emission units (presses) are subject to 326 IAC 8-1-6, because potential VOC emissions from each of the emission units is less than 25 tons per year.

326 IAC 8-2-5 (Paper Coating Operations)

This rule does not apply to this source, since no web coating or saturation processes are used.

326 IAC 8-5-5 (Graphic Arts Operations)

Since the printing presses are lithographic and are not rotogravure or flexographic, this rule does not apply to this source.

Conclusion

The operation of this printing presses shall be subject to the conditions of the attached proposed **Minor Source Operating Permit 097-17631-00329.**

VOC Potential to Emit

Company Name: The Jackson Group
 Street Address : 5804 Churchman By-Pass, Indianapolis, IN 46203
 Permit No.: 097-17631-00329
 County : Marion County
 Reviewer: Keshav Reddy

Large Press Department

Emission Unit ID	Material	One Sheet Area	Max. Capacity	Max. Usage Rate	VOC Weight %	Product Max. Usage, lbs/hr	Substrate Retention	VOC Emissions			
700 Roland		sq.in	Images Per Hour	mm sq.in/hr	lbs/mm sq.in	%	lbs/hr	%	lbs/hr	lbs/day	tons/yr
EU1	Ink	792.42	15,000	11.89	3.40	19.80%	40.41	95%	0.40	9.60	1.752
	Fountain Solution	792.42	15,000	11.89	0.13	99.00%	1.55	na	1.53	36.71	6.700
	Blanket Wash and Cleaning Solution	792.42	15,000	11.89	0.20	100.00%	2.38	na	2.38	57.05	10.412
	Clear Coating	792.42	15,000	11.89	3.40	19.80%	40.41	95%	0.40	9.60	1.752
Total:									4.71	112.97	20.618

440 Roland Rekord		sq.in	Images Per Hour	mm sq.in/hr	lbs/mm sq.in	%	lbs/hr	%	lbs/hr	lbs/day	tons/yr
EU2	Ink	1122.91	9,000	10.11	3.40	19.80%	34.36	95%	0.34	8.16	1.490
	Fountain Solution	1122.91	9,000	10.11	0.13	99.00%	1.31	na	1.30	31.22	5.697
	Blanket Wash and Cleaning Solution	1122.91	9,000	10.11	0.30	100.00%	3.04	na	3.04	72.96	13.315
	Clear Coating	1122.91	9,000	10.11	3.40	19.80%	34.36	95%	0.34	8.16	1.490
Total:									5.02	120.50	21.992

26 Komori		sq.in	Images Per Hour	mm sq.in/hr	lbs/mm sq.in	%	lbs/hr	%	lbs/hr	lbs/day	tons/yr
EU3	Ink	444.85	7,000	3.11	3.40	19.80%	10.59	95%	0.10	2.52	0.459
	Fountain Solution	444.85	7,000	3.11	0.13	99.00%	0.40	na	0.40	9.62	1.755
	Blanket Wash and Cleaning Solution	444.85	7,000	3.11	0.30	100.00%	0.93	na	0.93	22.42	4.092
	Clear Coating	444.85	7,000	3.11	3.40	19.80%	10.59	95%	0.10	2.52	0.459
Total:									1.54	37.07	6.765

Max. Combined Capacity (mmsq.in/hr) = 25.11

Total : 49.375

Small Press Department

E47 Hamada (Small Duplicator)		sq.in	Images Per Hour	mm sq.in/hr	lbs/mm sq.in	%	lbs/hr	%	lbs/hr	lbs/day	tons/yr
EU4	Ink	243.13	5,000	1.22	3.40	19.80%	4.13	95%	0.04	0.98	0.179
	Fountain Solution	243.13	5,000	1.22	0.13	67.70%	0.16	na	0.11	2.57	0.469
	Cleaning Solvent	243.13	5,000	1.22	0.15	98.50%	0.18	na	0.18	4.31	0.787
Total:									0.33	7.86	1.435

E665 Hamada (Small Duplicator)		sq.in	Images Per Hour	mm sq.in/hr	lbs/mm sq.in	%	lbs/hr	%	lbs/hr	lbs/day	tons/yr
EU5	Ink	189.75	3,000	0.57	3.40	19.80%	1.94	95%	0.02	0.46	0.084
	Fountain Solution	189.75	3,000	0.57	0.13	67.70%	0.07	na	0.05	1.20	0.219
	Cleaning Solvent	189.75	3,000	0.57	0.15	98.50%	0.09	na	0.08	2.02	0.368
Total:									0.15	3.68	0.672

E665 Hamada (Small Duplicator)		sq.in	Images Per Hour	mm sq.in/hr	lbs/mm sq.in	%	lbs/hr	%	lbs/hr	lbs/day	tons/yr
EU6	Ink	189.75	5,000	0.95	3.40	19.80%	3.23	95%	0.03	0.77	0.140
	Fountain Solution	189.75	5,000	0.95	0.13	67.70%	0.12	na	0.08	2.00	0.366
	Cleaning Solvent	189.75	5,000	0.95	0.15	98.50%	0.14	na	0.14	3.36	0.614
Total:									0.26	6.13	1.120

Max. Combined Capacity (mmsq.in/hr) = 2.74

Max. Combined Capacity (mmsq.in/yr) = 24002.4

Total : 3.226

Videojet (Total Response, Inc.)

		Ink VOC	Makeup VOC	Cleaner VOC	Max. VOC		
Printers Systems (4 Printers)		lbs/hr	lbs/hr	lbs/hr	lbs/day	tons/yr	
EU8	Ink	0.16	0.09	0.15	0.4	9.6	1.752
Total Source VOC Emission					12.409	297.824	54.353

Methodology :-

For Large and Small Presses

One Sheet Area (sq.in) = inches * inches

Max. Capacity (mmsq.in/hr) = One Sheet Area (sq.in) * Maximum Capacity (Images Per Hour)

Product Max. Usage (lbs/hr) = Maximum Capacity (mmsq.in/hr) * Maximum Usage Rate (lbs/mmsq.in)

Max. VOC Emissions (lbs/hr) = VOC Weight% * Product Max. Usage (lbs/hr) * Substrate Retention (%)

Max. VOC Emissions (lbs/day) = VOC Emissions (lbs/hr) * 24 hrs/day

Max. VOC Emissions (tons/yr) = VOC Emissions (lbs/hr) * 8760 hrs/yr * 1 ton/2000lbs

For Videojet Printer :-

Max. VOC (lbs/hr) = Ink VOC (lbs/hr) + Make UP VOC (lbs/hr) + Cleaner VOC (lbs/hr)

Max. VOC (lbs/day) = Total VOC (lbs/hr) * 24 hrs/day

Max.VOC (tons/yr) = Total VOC (lbs/hr) * 8760 hrs/yr * 1ton/2000lbs

HAP Emissions**Company Name :** The Jackson Group**Street Address :** 5804 Churchman By-Pass, Indianapolis, IN 46203**County :** Marion County**Operation Permit No. :** 097-17631-00329**Reviewer :** Keshav Reddy**Large Press Department**

HAP	Product	HAP Weight%	Max. Usage (lbs/mmsq.in)	Max. Area mmsq.in/yr	Max. HAP Emissions (lbs/yr)	Potential HAP Emissions (tons/yr)
Toluene	S-1645 SOLVENT BLEND	45.0%	0.120	219,964	11,878.06	5.94
						5.94
Ethylene Glycol	REDUX 6000	22.5%	0.080	219,964	3,959.34	1.98
						1.98
Glycol Ethers	MKEH 2912	8.2%	0.120	219,964	2,164.44	1.08
Glycol Ethers	REDUX 6000	70.0%	0.080	219,964	12,317.96	6.16
						7.24
Methanol	S-1645 SOLVENT BLEND	20.0%	0.120	219,964	5,279.13	2.64
						2.64
HAP Emissions (tons/yr) =						17.80

Small Press Department

Toluene	TYPE WASH	54.0%	0.150	24,002	1,944.19	0.97
Hexane	TYPE WASH	21.0%	0.150	24,002	756.08	0.38
Methanol	RYCOLITE	20.0%	0.130	24,002	624.06	0.31
Ethylene Glycol	TAKE-IT-OFF	2.0%	0.130	24,002	62.41	0.03
					HAP Emissions (tons/yr) =	1.69
					Total HAP Emissions (tons/yr) =	19.49

Methodology :-

Max. HAP Emissi Max. Usage Rate (lbs/mmsq.in) * Max. Combined Capacity (mmsq.in/yr)

Max. HAP Emissi Max. HAP Emissions (lbs/yr) * 1ton/2000lbs

PM and PM-10 Emissions

Company Name : The Jackson Group
 Street Address : 5804 Churchman By-Pass, Indianapolis, IN 46203
 County : Marion County
 Operation Permit No. : 097-17631-00329
 Reviewer : Keshav Reddy

LARGE PRESS DEPARTMENT

Emission Unit Id	Product	Max. Usage Rate (lbs/mmsq.in)	Maximum Capacity (mmsq.in/hr)	Max. Emissions (lbs/hr)	Max. Emissions (tons/yr)
700 ROLAND					
EU1	CORN STARCH	0.05	11.89	0.5945	2.60
440 ROLAND REKORD					
EU2	CORN STARCH	0.05	10.11	0.5055	2.21
26 KOMORI					
EU3	CORN STARCH	0.05	3.1100	0.1555	0.68
				Total :	5.50

WALL PRESS DEPARTMENT

E47 HAMADA					
EU4	CORN STARCH	0.05	1.22	0.0610	0.27
665 HAMADA					
EU5	CORN STARCH	0.05	0.57	0.0285	0.12
665 HAMADA					
EU6	CORN STARCH	0.05	0.9500	0.0475	0.21
				Total :	0.60
Total PM and PM-10 Emissions (tons/yr) =					6.10

Methodology :-

Max. Emissions (lbs/hr) = Maximum Capacity (mmsq.in/hr) * Maximum Usage Rate (lbs/mmsq.in)

Max. Emissions (tons/yr) = Max. Emissions (lbs/hr) * 8760 (hrs/yr) * 1ton/2000lbs

Summary of Potential to Emit**Company Name** : The Jackson Group**Street Address** : 5804 Churchman By-Pass, Indianapolis, IN 46203**County** : Marion County**Operation Permit No.** : 097-17631-00329**Reviewer** : Keshav Reddy

Pollutants	Potential To Emit (tons/yr)
PM	6.10
PM-10	6.10
SO2	0.00
NOX	0.00
VOC	54.35
CO	0.00
HAPS	
Toluene	6.91
Ethylene Glycol	2.01
Glycol Ethers	7.24
Methanol	2.95
Hexane	0.38
Total HAPs	19.49